

110687

FAA-00-7952-3

(1)



American ^{airline}
American Airlines®

00 SEP 15 PM 12:11

Federal Aviation Administration
Office of the Chief Counsel
ATT: Rules Docket No. 28293
800 Independence Avenue SW
Washington, DC 20591

September 15, 1995

NOV 5 3

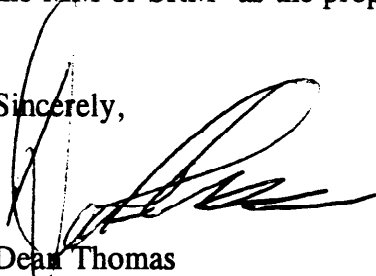
For Docket No. 28293,

Flagship Airlines (American Eagle) offers the following comments in regards to the "Operational and Structural Difficulty Reports" Notice of Proposed Rule Making:

The proposed FAR 121.704 states that primary structure (Structurally Significant Item (SSI)--ref. AC 25.1529-1) or principal structural elements (PSE's) are identified in the manufacturers' Maintenance Manual or Structural Repair Manual. This is currently not being done by all aircraft manufacturers. Of the four fleet types we operate, only one has primary structure classified in its' SRM.

Although in most cases, primary structure is readily identified by its' function, this is not always true. In order to avoid making the operator responsible for determining SSI's and PSE's, we suggest that aircraft manufacturers be required to clearly identify each SSI or PSE in their MM or SRM. This will eliminate any "guesswork" in regards to what should and should not be reported. Normally, the structural element classification has already been done during the MSG process and then incorporated into the Maintenance Program. However, individual structural element classifications (SSI's & PSE's) are not usually identified in MM's or SRM's. In order to make the "Structural Difficulty Report" workable, we believe SSI's & PSE's should be readily identified via the MM or SRM--as the proposed FAR states.

Sincerely,


Dean Thomas
Engineering
(615) 399-6475

cc: D. Miller (PMI), K. Troeger, P. Neuboldt